

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,

v.

HENRY KYLE FRESE,

Defendant.

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Case No. 1:19-cr-00304-LMB

DEFENDANT’S UNOPPOSED MOTION TO PERMIT TRAVEL

Defendant HENRY KYLE FRESE, by and through counsel, respectfully asks this Court for permission to travel by car from his residence in Philadelphia to Washington, D.C. on Tuesday, December 10, 2019 through December 11, 2019. The purpose of the travel is for Mr. Frese to attend meetings with his attorneys in both classified and unclassified settings. Mr. Frese is specifically asking for permission to stay overnight from December 10 to December 11 with a friend, A.E., who resides in Reston, Virginia, and who Mr. Frese affirms had no involvement in the charged offense conduct. Undersigned counsel has consulted with counsel for the United States, who have indicated that the government does not oppose Mr. Frese’s travel and his stay with the aforementioned individual in Reston, Virginia. Pretrial Services has also been made aware of Mr. Frese’s travel request and have indicated that they will await the ruling of the Court.

WHEREFORE, based on the foregoing good cause, Defendant respectfully requests that this Court grant him permission to travel from Philadelphia, PA to Washington, DC, and Reston, Virginia, from December 10 through December 11, 2019.

Date: December 9, 2019

Respectfully submitted,

Henry Kyle Frese,
By Counsel,

/s/ Stuart Sears
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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of December, 2019, I electronically filed a true copy of the foregoing motion with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all parties.

/s/ Stuart Sears
Stuart Sears
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